

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re: New York City Policing During Summer 2020
Demonstrations.

**DECLARATION OF
DEFENSE COUNSEL IN
FURTHER SUPPORT OF
DEFENDANTS' MOTION
TO DISMISS THE
AMENDED COMPLAINTS**

This filing relates to: *all cases*

No. 20 Civ. 8924

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Dara Weiss, Elissa Jacobs, and Brachah Goykadosh, attorneys duly admitted to practice in the State of New York, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

We are Senior Counsels in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and attorneys for defendants. As such, we are familiar with the facts and circumstances of this action. We make this declaration to place the relevant documents on the record in further support of defendants' motion pursuant to Rule 12(b)(1) and Rule 12(b)(6) of the Federal Rules of Civil Procedure.

1. Annexed hereto as Exhibit I is a copy of the resolution passed by the New York City Council concerning the New York City Police Reform and Reinvention Collaborative.

2. Annexed hereto as Exhibit J is a copy of the New York City Police Reform and Reinvention Collaborative Initiative Tracker.

3. Annexed hereto as Exhibit K is a copy of an updated New York City Police Department Mass Demonstration Response Recommendations Tracker. A prior version of this document was included with defendants' moving papers as Exhibit A.

Dated: New York, New York
May 14, 2021

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Senior Counsel
Special Federal Litigation Division

No. 20 Civ. 8163 (CM)

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GEORGIA M. PESTANA

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Of Counsel: Brachah Goykadosh, Elissa Jacobs, Dara Weiss

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Due and timely service is hereby admitted.

New York, New York, 2021

.....*Esq.*

Attorney for